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*April Isas*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

APRIL ISAS, an individual,

Plaintiff,

v.

CHIPOTLE SERVICES LLC, A Foreign  
Limited Liability Company; CHIPOTLE  
MEXICAN GRILL, INC., a Foreign  
Corporation; CMG PEPPER, LLC, a Foreign  
Limited Liability Company; SCOTT  
BOATWRIGHT; MATTHEW  
WANSTREET; MARK WATKINS; DOE  
INDIVIDUALS 1 through 300; and ROE  
BUSINESS OR GOVERNMENTAL  
ENTITIES 1 through 300, inclusive

Defendants.

Case No.: 2:24-cv-02305-JAD-DJA

**STIPULATION TO EXTEND TIME TO  
FILE PLAINTIFF'S SECOND AMENDED  
COMPLAINT; ~~[PROPOSED]~~ ORDER**

1 Plaintiff April Isas (“Plaintiff”), by and through her counsel of record, Greenberg Gross LLP,  
 2 and Defendants Chipotle Services LLC and Chipotle Mexican Grill, Inc., together with any  
 3 remaining individual defendants in this action (collectively referred to as “Defendants”), by and  
 4 through Defendants’ counsel of record, the law firms of Marquis Aurbach Chtd. and Martenson,  
 5 Hasbrouck & Simon LLP, hereby stipulate to extending Plaintiff’s deadline to **April 24, 2025**, to  
 6 file her amended complaint.

7 CMG Pepper, LLC and Mark Watkins were dismissed as parties to this action at the Court’s  
 8 April 7, 2025, hearing on Defendants’ motions to dismiss. (ECF No. 63). While all claims were also  
 9 dismissed as to Matthew Wanstreet, the Court granted Plaintiff leave to amend the sexual assault  
 10 and battery claim against him. *Id.*

11 Good cause supports Plaintiff’s request for an extension to file her second amended  
 12 complaint. On April 16, 2025, Plaintiff obtained new counsel and requested a substitution of counsel  
 13 the same day. ECF No. 67.

14 Plaintiff’s newly retained counsel has recently taken over the representation in this matter  
 15 and requires additional time to properly prepare and file the Second Amended Complaint. Counsel  
 16 needs time to review the case file, speak with the client, and consult with opposing counsel regarding  
 17 potential amendments to streamline the issues for the Court’s consideration.

18 While Defendant Scott Boatwright has not yet appeared in this action, Plaintiff agrees not to  
 19 include Boatwright as an individual defendant in her Second Amended Complaint. Defendants’  
 20 counsel has agreed to waive any costs associated with the prior litigation against Boatwright and to  
 21 accept service of a deposition notice or subpoena for Boatwright, reserving all rights, defenses, and  
 22 objections to the deposition notice or subpoena other than those related to the sufficiency of service.

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This extension is not sought for purposes of delay, but rather to ensure the amended pleading properly addresses the issues in this case and potentially narrows the matters in dispute.

**IT IS SO STIPULATED.**

GREENBERG GROSS LLP

MARQUIS & AURBACH

/s/ Matthew T. Hale, Esq.

/s/ Jordan W. Montet, Esq.

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**ORDER**

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: 4/18/2025